

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

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GREATER BOSTON PLUMBING  
CONTRACTORS ASSOCIATION,

Plaintiff,

v.

WILLIAM ALPINE, in his official capacity as  
Director of the MASSACHUSETTS  
DEPARTMENT OF FAMILY AND  
MEDICAL LEAVE,

Defendant.

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CIVIL ACTION NO.:  
1:20-cv-12283-GAO

LEAVE TO FILE  
GRANTED ON: March 31, 2025

**PLAINTIFF’S NOTICE OF FILING SUPPLEMENTAL AUTHORITY  
REGARDING OPPOSITION TO DEFENDANT’S MOTION TO DISMISS**

Pursuant to leave granted by the Court on March 31, 2025, plaintiff Greater Boston Plumbing Contractors Association hereby gives notice of the filing of supplemental authority regarding its Opposition to Defendant’s Motion to Dismiss. The supplemental authority consists of Pharm. Care Mgmt. Ass’n v. Mulready, 78 F.4<sup>th</sup> 1183 (10th Cir. 2023) (petition for writ of certiorari filed May 10, 2024), reversing Pharm. Care Mgmt. Ass’n v. Mulready, 598 F. Supp.3d 1200 (W.D. Okla., Apr. 4, 2022), copies of which are attached hereto as Exhibit A. The supplemental authority is relevant to Plaintiff’s Opposition to Defendant’s Motion to Dismiss (Docket No. 59 at pages 7-10) and Plaintiff’s Surreply (Docket No. 62 at pages 1-2) and supports Plaintiff’s argument that an effective impact on ERISA benefit design or plan administration is a sufficient injury for standing purposes.

**GREATER BOSTON PLUMBING  
CONTRACTORS ASSOCIATION,**  
By its attorneys,

*/s/ Johanna L. Matloff*

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**Certificate of Service**

I hereby certify that this document will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on this 1<sup>st</sup> day of April, 2025.

*/s/ Johanna L. Matloff*